



FWP Region 4  
4600 Giant Springs Road  
Great Falls, MT 59405

August 4, 2020

Dear Interested Citizen,

Thank you for your thoughtful review of and comments on Montana Fish, wildlife & Parks' (FWP) proposal to restore marten to the Little Belt Mountain complex in central Montana. This proposed action would translocate a minimum of 60 marten from central and southwest Montana to the Little Belts over two winters, beginning in 2020/21.

Enclosed is a decision notice in which FWP reviews public comments and explains its rationale for choosing the proposed action (Alternative B) as described and explained in the Draft Environmental Assessment (EA). Upon completion of the public involvement process, FWP accepts the draft EA as final. The decision document includes all comments received during the public review and comment period for the Draft EA for this project.

Please feel free to contact me at (406) 454-5840 with any questions you may have. Thank you for your interest and participation.

Sincerely,

Gary Bertellotti  
Regional Supervisor



## **DECISION NOTICE for the Reintroduction of Marten to the Little Belt Mountains**

*Montana Fish, Wildlife & Parks; Region 4  
4600 Giant Springs Road, Great Falls MT 59405  
(406) 454-5840  
August 4, 2020*

### **INTRODUCTION AND PROPOSED ACTION**

This proposal is to restore a self-sustaining and genetically diverse population of marten (preferably *M. caurina*) to the Little Belt Mountains of central Montana. The Little Belt Mountains are an island range located 30 miles southeast of Great Falls.

Under this proposal, at least 60 martens (> 30 female) would be captured in southwest Montana during winter and translocated to areas of the Little Belts that habitat models and biologists predict have extensive suitable habitat.

The Little Belts are currently open to regulated marten trapping, therefore FWP would also ask the Commission to temporarily close the Little Belt Mountains to recreational marten trapping for a period during and following the translocations to allow marten populations to become established.

### **ALTERNATIVES**

#### **Alternative A: No Action**

Under the no action alternative, martens would not be reintroduced to the Little Belt Mountains at this time. Alternative A represents the current baseline condition and responds to those who oppose marten reintroduction, including respondents wishing to postpone any release of marten. Under this alternative marten would likely never repopulate their historic range in the Little Belt Mountains

**Alternative B: Proposed Action**

Alternative B represents the preferred Alternative. This alternative describes restoring a sustainable population of martens to the Little Belt Mountains. Under this Alternative, the Fish and Wildlife Commission would generally approve an active marten restoration program for the Little Belts, beginning with a specific project to transplant 60 martens from southwest Montana to the Little Belt Mountains beginning as soon as fall/winter 2020/21.

**PUBLIC REVIEW PROCESS**

FWP is required by the Montana Environmental Policy Act (MEPA) to assess potential impacts of its proposed actions to the human and physical environments, evaluate those impacts through an interdisciplinary approach, including public input, and make a decision based on this information. FWP released a cover letter (summarizing proposal details) and draft environmental assessment (EA; "Reintroduction of Marten to the Little Belt Mountains") for public review of this proposal on July 10, 2020 and accepted public comment for 21 days through July 31, 2020.

FWP extensively noticed this proposal by publishing it on the FWP website, through news releases, and by directly contacting land managers, sporting groups, and wildlife conservation organizations. FWP received 33 comments from individuals or groups supporting the project; one commenter encouraged FWP to allow marten to recolonize the Little Belts naturally. That public comment is directly appended to the end of this Decision Notice.

**DECISION**

Based upon the Draft Environmental Assessment and the applicable laws, regulations, and policies, I have determined that the proposed action will not have significant negative effects on the human and physical environments associated with this project. Therefore, I conclude that the EA is the appropriate level of analysis, and preparation of an Environmental Impact Statement is unnecessary.

No concerns were raised during the public comment period that would bring the environmental analysis into question. All but one of the commenters supported the proposed action, and the single critical commenter supported restoration of marten in the mountain Little Belts but hoped that it would occur without active intervention. Based on the analysis in the Draft EA and including the lack of suggested changes to the Draft EA, I have selected the "Proposed Action" (Alternative B).

By notification of this Decision Notice, the draft EA is hereby made the final EA. The finding of selection for the "Proposed Action" Alternative B for the Reintroduction of Marten to the Little Belt Mountains is the product of this Decision Notice.



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Gary Bertellotti  
Region 4 Supervisor  
Montana Fish, Wildlife & Parks

8/4/2020

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## Public Comment Received on the Draft Environmental Assessment

Comment Body	From:
<p>Jay -</p> <p>I am in support of pursuing the marten reintroduction into the Little Belts. The habitat is there throughout much of the forested landscape.</p> <p>As the retired FWP furbearer coordinator, my experience with track surveys over many years would indicate ample prey abundance. Also some older growth forest types are available.</p> <p>A Colorado University student that I supported years ago found no current evidence of marten presence, but also that the higher elevation habitats should support this species.</p> <p>I recommend that you review relative marten abundance from the various track survey routes to help determine potential source populations for reintroduction. Many Southwestern Montana mountain ranges have marten. The Tobacco Roots were an interesting discovery, despite being reported as extirpated in the literature. They may be better able to colonize new habitats. Good question.</p> <p>I would assume there is a plan to monitor the reintroduced animals, either radioed or indirectly by track surveys. Would implants be possible rather than collars? They spend alot of time under snow and through cavities, for which collars could impede movements.</p> <p>Anyway, glad to know you have continued to carry the touch. This is a good project and worth the time and effort. Glad to hear you would use local trappers to contribute toward the effort.</p> <p>I also support the temporary marten trapping season closure in the Little Belts.</p> <p>Brian Giddings FWP Wildlife Biologist, Retired P.O. Box 4334 Helena, MT 596</p>	bgiddings58

<p>I support FWP's proposal to reintroduce marten to the Little Belt Mountains. Marten were native in the Little Belts. The habitat appears to be high quality for marten and appears similar to habitat in adjacent mountain ranges that support thriving marten populations. Reintroduction of marten into the Little Belt Mountains will restore a native wildlife species to prime habitat from which it was extirpated.</p> <hr/> <p>This e-mail was generated from the 'Draft Environmental Assessment for the Reintroduction of Marten to the Little Belt Mountains' Public Notice Web Page.</p>	<p>glennelison@gmail.com</p>
<p>Sent from my Verizon, Samsung Galaxy smartphone----- Original message -----From: Jeff Herbert &lt;jefftherbert@gmail.com&gt; Date: 7/23/20 1:24 PM (GMT-07:00) To: "Loecker, Cory" &lt;cloecker@mt.gov&gt; Subject: [EXTERNAL] Re: Draft Environmental Assessment for the Reintroduction of Marten to the Little Belt Mountains Hey there. FYI - Just sent a short comment in to the Department on behalf of MSA in support of the proposed action. I think it's a great opportunity. Thx for advancing. Jeff Sent from my iPad On Jul 13, 2020, at 7:46 AM, Loecker, Cory &lt;cloecker@mt.gov&gt; wrote: ? Folks, Please review and provide comments. Pass onto interested parties please. Thanks, Cory Draft Environmental Assessment for the Reintroduction of Marten to the Little Belt Mountains The enclosed draft Environmental Assessment (EA) has been prepared regarding a proposal to reintroduce marten to the Little Belt Mountains in central Montana. Marten were historically present in the Little Belts but were likely extirpated by the early 20th century. Habitat models and biologists predict that there is extensive high-quality marten habitat in the Little Belts and marten currently occur in adjacent mountain ranges.  <a href="http://fwp.mt.gov/news/publicNotices/environmentalAssessments/speciesRemovalAndRelocation/pn_0087.html?&lt;EA Reintroducaiton of Marten to the Little Belt Mountains.pdf&gt;">http://fwp.mt.gov/news/publicNotices/environmentalAssessments/speciesRemovalAndRelocation/pn_0087.html? &lt;EA Reintroducaiton of Marten to the Little Belt Mountains.pdf&gt;</a></p>	<p>Loecker, Cory</p>

<p>The Montana Sportsmen Alliance appreciates the opportunity to offer strong endorsement of the proposal to reintroduce marten to the Little Belt Mountains. Restoring an important forest carnivore to an area of extensive, high quality forest habitat that is currently unoccupied, is responsible native species management. It supports the public trust. We recommend approval by the Commission and look forward to action by the Department as it implements the approved reintroduction effort.</p> <p>MSA Leadership Group</p> <hr/> <p>This e-mail was generated from the 'Draft Environmental Assessment for the Reintroduction of Marten to the Little Belt Mountains' Public Notice Web Page.</p>	<p>Jefftherbert@gmail.com</p>
<p>JAY saw the article in the Missoulian this am. Very interested and supportive of the effort. Please send me the link on the info you have on the FWP web page. We live up Nine Mile west of Missoula and have seen a couple on our place. Have a camcorder and would like to get some images of them. What is the best method of attracting the Martins to a site in their habitat ? Best always BOB Bob BrughWild Rose Ranch MT LLP25685 Nine Mile RoadHuson, MT 59846(406) 626.4687Cell 240.7368E-mail rgb@montana.com</p>	<p>Bob Brugh</p>

Good afternoon,

From my understanding on the distribution of the marten, they have not inhabited the Little Belt Mountains since the early 1900's. If this is the case, why is there currently trapping opportunities for them in this area? I would assume that if there are trappers in the area that utilize the Little Belts for trapping, they might have reservations about not having the ability to trap while the reintroduction is taking place. With the relocation numbers tentatively set for ~60 animals for the fall/winter of 2020/2021, is there a possibility for a higher number in the event that more are captured in Western Montana? I feel that this will be a fantastic idea for the area and will encourage more folks to visit the area (in good time) and catch a glimpse of the marten.

Respectfully,

Michael Tucker

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This e-mail was generated from the 'Draft Environmental Assessment for the Reintroduction of Marten to the Little Belt Mountains' Public Notice Web Page.

Michael.r.tucker@  
outlook.com

<p>Good afternoon, From my understanding on the distribution of the marten, they have not inhabited the Little Belt Mountains since the early 1900's. If this is the case, why is there currently trapping opportunities for them in this area? I would assume that if there are trappers in the area that utilize the Little Belts for trapping, they might have reservations about not having the ability to trap while the reintroduction is taking place. With the relocation numbers tentatively set for ~60 animals for the fall/winter of 2020/2021, is there a possibility for a higher number in the event that more are captured in Western Montana? I feel that this will be a fantastic idea for the area and will encourage more folks to visit the area (in good time) and catch a glimpse of the marten. Respectfully, Michael Tucker</p> <hr/> <p>This e-mail was generated from the 'Draft Environmental Assessment for the Reintroduction of Marten to the Little Belt Mountains' Public Notice Web Page.</p>	<p>Michael.r.tucker@outlook.com</p>
<p>As we have seen with other species if they are in surrounding areas they move on there own with out the expense of human help to move them. Why spend time and money to reintroduce something that will happen anyway.</p> <hr/> <p>This e-mail was generated from the 'Draft Environmental Assessment for the Reintroduction of Marten to the Little Belt Mountains' Public Notice Web Page.</p>	<p>dhajenga@jbcounty.org</p>

<p>I think it's a great opportunity for you to try to get the Pine marten repopulated into the Little Belts. I highly enjoy trapping these little critters and would be happy to be involved in the trapping portion of your reintroduction project. I trap anywhere from 6 to 10 each winter in the Boulder River drainage south of Big Timber. Just let me know if I can help, Thanks!</p> <p>Charles Ferguson Big Timber, MT 406-932-6429</p>	<p>charles ferguson</p>
<p>Please do more projects like this!</p> <p>_____ This e-mail was generated from the 'Draft Environmental Assessment for the Reintroduction of Marten to the Little Belt Mountains' Public Notice Web Page.</p>	<p>Chadjhoover@gmail.com</p>
<p>Hello,</p> <p>Writing to voice my emphatic support for the marten reintroduction to the Little Belt Mountains.</p> <p>While I am not an opponent of all forms of trapping I agree that trapping should be closed indefinitely or until such a time when the program has been deemed a success and the populations established to a level that could support recreational trapping.</p> <p>Thank you,</p> <p>-Chris</p>	<p>Chris Johnson</p>

<p>The Marten re-introduction plan is superb!! I have full faith and confidence in the mission!</p> <p>Cheers, Cliff Bove</p> <hr/> <p>This e-mail was generated from the 'Draft Environmental Assessment for the Reintroduction of Marten to the Little Belt Mountains' Public Notice Web Page.</p>	<p>boreas3989@gmail.com</p>
<p>Gary - I've read the EA on marten reintroduction to the Little Belts. This is a great initiative and the National Wildlife Federation strongly supports moving forward. Please feel free to contact us if there are any specific steps where we could be helpful.</p>	<p>Tom France</p>
<p>Good morning: I have read the Proposal and Draft EA for reintroducing Marten into the Little Belt Mountains. As a resident of Lewistown and frequent hiker in the Belts, within the last three weeks I have hiked up Yogo and Big Baldy peaks and hiked into Buffalo Canyon, I am very supporting of your efforts. I like to snowshoe in the Belts in the spring too and look forward to the day when I can see marten tracks there. I also interested to learn more about Martes caurina. Thanks for restoring this native species. Harvey Nyberg 609 W Evelyn Street Lewistown, MT 59457</p>	<p>Harvey Nyberg</p>

<p>Hi Jay,</p> <p>I was excited to see your EA to reintroduce marten back to the Little Belts and curious if you are planning to conduct post-release monitoring/research? Would welcome the opportunity to discuss if you have time and interest.</p> <p>Thanks and stay healthy,</p> <p>Lance</p> <p>Lance B. McNew, Ph.D.  Associate Professor  Director, Wildlife Habitat Ecology Lab  Department of Animal &amp; Range Science  Montana State University  Bozeman, MT 59717  Ph: (406) 994-6645</p>	<p>McNew, Lance</p>
<p>Please do more projects like this!</p> <hr/> <p>This e-mail was generated from the 'Draft Environmental Assessment for the Reintroduction of Marten to the Little Belt Mountains' Public Notice Web Page.</p>	<p>Chadjhoover@gmail.com</p>
<p>Glad to hear the effort is being made! Let?s hope it works.</p> <hr/> <p>This e-mail was generated from the 'Draft Environmental Assessment for the Reintroduction of Marten to the Little Belt Mountains' Public Notice Web Page.</p>	<p>Simmskk@outlook.com</p>
<p>Definitely a good idea. Harold Johnson Montana Trappers Association Vice President East.</p>	<p>bigskyhal.excite</p>

<p>Hi Jay,</p> <p>I am for this reintroduction of pine marten into the Little Belt Mountains as well as the extraction of the seed marten coming from western Montana. Please place this email in the "pro" pile.</p> <p>One of my trapping buddies brought this is up to Brian Giddings about 7-8 years ago. At that time, we were willing to catch the marten for the seed.</p> <p>Stay safe out there...</p> <p>Kim Latterell 1630 Cody Drive Billings, MT 59105 406 245 3153</p>	<p>kim latterell</p>
<p>This proposal has my FULL support. May they go forth and prosper!</p> <p>Tim Thier</p> <hr/>	<p>tthier@interbel.net</p>

<p>I support the proposed reintroduction of Marten into the Little Belt Mountains. The Little Belts have a large area of suitable habitat that is primarily found on Forest Service Lands. With this area being historic Marten habitat, their reintroduction will contribute to increasing the diversity and completeness of the ecosystem in the Little Belt Range. If this reintroduction is a success, possibly one day trappers will be able to utilize this new resource in a sustainable way.</p> <hr/> <p>This e-mail was generated from the 'Draft Environmental Assessment for the Reintroduction of Marten to the Little Belt Mountains' Public Notice Web Page.</p>	<p>tr_heater@hotmail.com</p>
<p>Hello Jay, I just looked over the Marten Reintroduction PDF and I'm in support. Anything that would gladly eat some of those red squirrels around would be great. Cool little furbearing animals. Good luck with project.</p> <p>Thanks,</p> <p>Kyle</p>	<p>Kyle Reedy</p>
<p>As a landowner in the Little Belts we would love to see Marten reintroduce here. Thank you for everything you do!</p> <hr/> <p>This e-mail was generated from the 'Draft Environmental Assessment for the Reintroduction of Marten to the Little Belt Mountains' Public Notice Web Page.</p>	<p>cw1313d@yahoo.com</p>

<p>As a trapper I am absolutely for the reintroduction proposal. This is text book conservation and should be welcomed with open arms by all. Only thing I would add is a hotline or something where people could inform fwp of marten movement in the area so that it could be better tracked where the newly reintroduced marten are moving, signs of reproduction, and if they are staying closer to certain areas for food or better habitat. Also come up with a population goal and stop the trapping of marten in the little belt area until it can be figured they have set up a reasonable population.</p> <hr/> <p>This e-mail was generated from the 'Draft Environmental Assessment for the Reintroduction of Marten to the Little Belt Mountains' Public Notice Web Page.</p>	<p>arossmt@gmail.com</p>
<p>Yes, emphatically yes!Also, I'm a staff writer for the Livingston Enterprise. Will they be trapping south of Livingston or in the Crazies? I'd like to do a story with a trapper. Would you please pass along my inquiry? Thank you. - Nate Howard Photo EditorLivingston EnterpriseC 406-599-2047</p>	<p>Enterprise News Photo</p>

<p>Jay – I’ve run into you a few times when I worked for DNRC but I don’t think we’ve met. I work in the Land and Water Program here and I love to trap. My daughter and I trap marten near Georgetown Lake each winter, and I would be absolutely thrilled to have a reason to trap with fur prices so low. Plus it would be really cool with a kid. If there is any way we can live-trap this year and get you some marten for the Big Belts I would love to. Obviously it would require some changes in terms of timing and trap checks etc. but there are certainly plenty of marten where we trap. Please let me know if I can help. Martin</p> <p>Martin Balukas  Land Agent  Lands Unit  Montana Fish, Wildlife &amp; Parks</p> <p>P.O. Box 200701  Helena, MT 59620-0701  Ph: (406) 444-4063  C: (406) 459-4031</p>	<p>Balukas, Martin</p>
<p>This looks like a good project and I’m in full support of it. While serving as the forest wildlife biologist on the Lewis and Clark National Forest from 1986-2005 our winter track surveys did show Martin tracks east of the highway but never west of the highway. That was in the 1990’s. We could never figure out why there was no Martin in the tenderfoot drainage even thou there appeared to be good habitat. So stocking on both sides of the highway through the little belts would insure that the best habitat would have Martin.</p> <p>_____ This e-mail was generated from the 'Draft Environmental Assessment for the Reintroduction of Marten to the Little Belt Mountains' Public Notice Web Page.</p>	<p>cabernetpd@msn.com</p>

<p>A great project and super use of fund as well as donations. MT Fwp lucky to have a great fur bearer team. Makes it seem like it could actually be my Fwp.</p> <hr/> <p>This e-mail was generated from the 'Draft Environmental Assessment for the Reintroduction of Marten to the Little Belt Mountains' Public Notice Web Page.</p>	<p>Hughes@mtintouch.net</p>
<p>To Whom it May Concern;</p> <p>The Montana Trappers Association is in full support of this project are are working with the MTFWP biologists to see that it is successful.</p> <p>Jim Buell</p> <p>MTA President</p> <hr/> <p>This e-mail was generated from the 'Draft Environmental Assessment for the Reintroduction of Marten to the Little Belt Mountains' Public Notice Web Page.</p>	<p>7mbuell@itstriangle.com</p>
<p>Stock martin. My question. . Is there enough for martin to eat.</p> <p>I live in region one, never seen a martin and I am out in forest several times a week.</p> <p>Animals in our dead old growth thick forest are dismal.</p> <hr/>	<p>Rmtslone@gmail.com</p>



July 31, 2020

Gary Bertellotti  
Montana Fish, Wildlife & Parks  
Region 4 Supervisor  
Great Falls, MT  
[gbertellotti@mt.gov](mailto:gbertellotti@mt.gov)

Jay Kolbe  
Montana Fish, Wildlife & Parks  
Region 4 Wildlife Biologist  
PO Box 527  
White Sulphur Springs, MT 59645  
[jkolbe@mt.gov](mailto:jkolbe@mt.gov)

Dear Mr. Bertellotti and Mr. Kolbe,

The Wild Sheep Foundation and Montana Wild Sheep Foundation strongly support the restoration of pine marten to the Little Belt Mountains. Restoring species diversity by reintroduction of pine marten once native to the Little Belts is noteworthy. As a member of the International Union for Conservation of Nature the WSF is committed, along with its chapters to restoration of native species to formerly occupied habitat.

We also want to acknowledge Montana FWP's collaboration with the Southwest Montana Trappers Association in providing live animals from areas that are genetically connected to the Little Belts. We thank the Southwest Montana Trappers Association for actively participating in restoring a species that has contributed so richly to Montana's wildlife heritage and trapping legacy.

We look forward to celebrating a restored pine marten population in one of Montana's island mountain ranges, one that will increase wildlife diversity, provide recreational viewing and sustainable use harvest opportunities in the future.

Well done and Thank You!

Kurt Alt  
Conservation Director, Montana and International Programs  
Wild Sheep Foundation and Montana Wild Sheep Foundation  
[kalt@wildsheepfoundation.org](mailto:kalt@wildsheepfoundation.org)



Protecting Montana's wildlife,  
land, waters and hunting & fishing  
heritage for future generations.

July 30, 2020

Mr. Jay Kolbe  
Montana Fish, Wildlife, & Parks, Region 4  
P.O. Box 527  
White Sulphur Spring, MT 59645

**RE: Draft EA for the Reintroduction of Martens to the Little Belt Mountains**

Dear Mr. Kolbe,

The Montana Wildlife Federation (MWF) is our state's oldest and largest state-based wildlife conservation organization. We were formed in 1936 when hunters joined landowners to restore depleted wildlife in Montana, and for 84 years we have worked on key issues affecting wildlife, habitat and access.

MWF is strongly supportive of the proposed reintroduction of American martens (*M. americana* or *M. caurina*) to the Little Belts Mountains of central Montana. With the previous extirpation of this species from island mountain ranges across the west, it is imperative that we take the necessary actions to restore martens to their historic range. This action directly follows the objective to "increase species diversity and facilitate marten range expansion back into the mountains of central Montana" as stated by the Fish & Wildlife Commission in 2014.

As stated in the draft environmental assessment (EA), there is significant quality marten habitat found throughout the Little Belt Mountains as well as adjacent mountain ranges. However, this species is notoriously poor at dispersing across unsuitable habitat and therefore it is unlikely natural recolonization will occur. Thankfully there is a precedent for success in translocation and reintroduction attempts, such as this effort, as seen in other successful marten reintroductions in similar mountain ranges. We at MWF would like to thank Montana Fish, Wildlife, & Parks (FWP) for following the examples set in similar reintroductions across the west when developing the procedures in this draft EA.

MWF commends FWP for taking the initiative to restore the historic biodiversity found in central Montana. Thank you for the opportunity to comment and voice support of this project. If you have any questions, please contact Eric Clewis, our Western Montana Field Coordinator, at (832) 444-6976 or [eclewis@mtwf.org](mailto:eclewis@mtwf.org).

Sincerely,

Frank Szollosi  
Executive Director

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**File Code:** 2610  
**Date:** July 31, 2020

Montana Fish, Wildlife, and Parks  
Attn: Jay Kolbe  
P.O. Box 527  
White Sulphur Springs, MT 59645

Dear Jay:

Thank you for the opportunity to provide comments on the proposed marten and bighorn sheep re-introductions to the Little Belt Mountains. The area proposed for reintroduction overlaps with the Helena-Lewis and Clark National Forest (Forest) and we are excited about the potential to restore and increase the presence of these native species to the Little Belts Mountains. Please find our comments below for both draft environmental assessments (EA).

**Reintroduction of Marten to the Little Belt Mountains**

We support the reintroduction of marten to the Little Belt Mountains. The Forest is currently finalizing our revised Land Management Plan and your proposal is aligned with components of both our existing plan and the revised plan. Specifically, our existing plan provides for huntable and trappable populations of furbearers (p. 2-5)<sup>1</sup>. Our revised plan, once finalized, provides for “[n]ative and desired nonnative wildlife species [that] are available on NFS lands for a variety of nonhunting recreational opportunities such as viewing and photography” (p. 116)<sup>2</sup>. And that “[f]urbearers are present and potentially available to trappers on NFS lands and habitat on NFS lands provides trapping opportunities that support Montana Fish, Wildlife, and Parks population and harvest objectives” (p. 116)<sup>2</sup>. These provisions are aligned with your stated goal to restore native species and provide recreational marten harvest opportunity.

We support the temporary closure of marten trapping in the Little Belts so that marten populations can become established.

While we are unaware of any potential conflicts with marten reintroduction and our management activities (e.g. snowmobiling, vegetation management, etc.) we ask that you work closely with our wildlife staff to ensure that any potential issues are resolved quickly and to the satisfaction of both agencies.

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<sup>1</sup> Lewis and Clark National Forest Plan at [https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb5409083.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5409083.pdf)

<sup>2</sup> 2020 Land Management Plan, Helena-Lewis and Clark National Forest at [https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd743204.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd743204.pdf)



**Potential Reintroduction of Bighorn Sheep into the Little Belt Mountains, Central Montana**

The Forest also supports the reintroduction of bighorn sheep to the Little Belt Mountains. As with marten, both our current Forest Plan and our proposed revised plan recognize the need to provide habitat to support bighorn populations on the Forest. Bighorn sheep are currently identified as a management indicator species in our current plan (p. 6-14)<sup>1</sup>; with that comes the requirement to maintain viable populations (p. E-1)<sup>1</sup>. Our proposed revised plan recognizes the role of the Little Belt Mountains as bighorn sheep habitat (p. 167)<sup>2</sup>. The proposed revised plan also recognizes that effective separation of bighorn sheep and domestic sheep and goats on NFS lands is key to successful reestablishment of bighorn sheep to the Little Belt Mountains (p. 172)<sup>2</sup>.

The proposed reintroduction of additional bighorn sheep to bighorn sheep already present in the Little Belt Mountains should facilitate the establishment of a viable bighorn sheep population. Upon successful translocation, the addition of a wild sheep herd would be beneficial for both Forest visitors and the area ecology, which had been known for having bighorn sheep prior to Euro-American settlement. The reintroduction of bighorn sheep would complement the Forest's and Districts' efforts to maintain/restore bighorn sheep habitat.

The draft EA states that this translocation is being considered a reintroduction rather than an augmentation. Clarification on the difference(s) between an augmentation and reintroduction as they relate to your policy and definitions would be helpful for the public and the Forest.

While rather minor, the draft EA references the "Judith Ranger District", whereas it is the "Judith-Musselshell Ranger District". The Judith Ranger District and Musselshell Ranger District have been administratively combined into one larger district. It would be helpful to make this change in the final EA to minimize confusion with the public.

It might also be helpful to clarify in the draft EA at page 22, "Chapter 4. Environmental Consequences", that the only livestock grazing that may be impacted would be cattle grazing, since there are no active or proposed domestic sheep grazing permits on the Forest in the Little Belt Mountains. We concur with FWP's assessment that there would likely be little to no competitive interaction for forage between cattle and the proposed bighorn sheep, as sheep prefer to be in steep, rocky, precipitous areas of escape terrain that cattle are not likely to forage in or around.

Our main concern is the potential for disease transmission between wild bighorn sheep and domestic sheep or goats. Your draft EA addresses this concern in that you state you will work with area domestic sheep producers to minimize comingling and to encourage collaborative efforts to maintain separation. The Forest is also committed to minimizing risk of disease transmission from domestic livestock to bighorn sheep particularly as articulated in our proposed revised plan: "The best available scientific information and the most current recommendations made through agency or interagency efforts shall be used to determine and establish the means with which to achieve effective separation between bighorn sheep and domestic sheep and goats on NFS lands" (p. 172)<sup>2</sup>. We believe that together we can navigate the challenges that may arise should comingling between domestic livestock and bighorn sheep occur. We ask that you continue to work with our wildlife staff throughout the reintroduction effort and subsequent population establishment.

If you have further questions, please contact wildlife biologists David Kemp at 406-566-4014, [david.kemp@usda.gov](mailto:david.kemp@usda.gov), or Allison Kolbe at 406-547-6001, [allison.kolbe@usda.gov](mailto:allison.kolbe@usda.gov). Thank you again for the opportunity to provide comments!

Sincerely,

A handwritten signature in black ink, appearing to read 'W. Avey', written in a cursive style.

WILLIAM AVEY  
Forest Supervisor

cc: Ron Wiseman; Carol Hatfield; David Peters; David Kemp; Allison Kolbe; Denise Pengeroth